



Preparing for NCLB Monitoring; Including Time and Effort Reporting Requirements

Diane Stuehmer

Federal Programs Administrator

Shane Rhian

Financial Services Director

Brad Conner

Title I Consultant



Yikes! We are Being Monitored!

- Don't panic!
- Tools to help you prepare
 - ESEA/NCLB Monitoring Guide Checklist
 - ESEA/NCLB Consolidated Application
 - School Improvement Plan
 - The NCLB Reviewer for your District



ESEA/NCLB Monitoring Guide Checklist

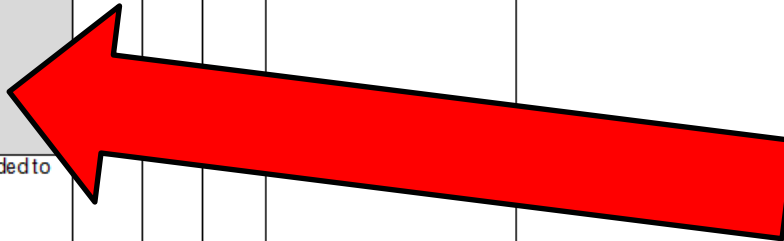
- Available at
<http://www.education.ne.gov/federalprograms/Documents/Title%20I/2013-14%20NCLB%20Monitoring%20Guide%20Checklist.doc>
- Lists the criteria that will be reviewed
- Lists options for documentation
- Some criteria require specific documentation
 - Indicated with **bold font** within a gray cell on the checklist



Example of Required Documentation

Nebraska ESEA/NCLB and McKinney-Vento Compliance Monitoring Guide Checklist

Criteria	Options for Documentation ITEMS IN BOLD ARE REQUIRED	District / ESU Response				NDE Response
		Yes	No	NA	Comments	Comments
7. District shall notify the parents of each student attending any school that the parents may request, and the district will provide to the parents on request, in a timely manner, information regarding the professional qualifications of the student's teacher(s). <i>§ 1111(h)(6)(A)</i>	✓ Sample of notification provided to parents					
8. School shall provide timely notice to parents if their child will be taught by a teacher not meeting ESEA/NCLB requirements for four or more consecutive weeks. <i>§ 1111(h)(6)(B)(ii)</i>	✓ Sample of notification provided to parents					
—Standards/Assessment/Accountability—						
1. Students receiving services in Title I are held to the same standards and expectations as all other students and are assessed with the regular population without accommodations. <i>§ 1111(b)(1)(B); § 1111(b)(1)(E); § 1111(b)(3)(C)(i)</i>	✓ District procedures for standards and assessment (local district assessment plan) ✓ Assessment procedures					
2. School profiles with assessment results, including disaggregated data of all ESEA/NCLB groups meeting the minimum group size for AYP, are provided to parents and to the public. <i>§ 1111(h)(2)(A&B)</i>	✓ District performance reports or report cards ✓ Link on district website to NDE State of the Schools Report					
3. All parents receive individual progress reports of students' performance on state standards. <i>§ 1111(b)(3)(C)(xii)</i>	✓ Sample of progress reports provided to parents ✓ NeSA Parent Reports					





What Will NDE Staff Need to See?

- Districts should have documentation available for **EVERY** criteria listed on the checklist
- Copies needed for NDE Reviewer to take with them for all criteria that are listed in highlighted gray cells



How Should We Organize the Information?

- NDE does not have a required format for organizing the information for the monitoring visit—use what works best for you
 - Binders with items clearly marked
 - Folders with items clearly marked
 - Thumb drive with all needed documentation along with a computer for viewing
- A folder with items clearly marked for collected documentation is helpful



ESEA/NCLB Application & Monitoring

- Districts do not need to print the application, but reviewers will review the application prior to the monitoring visit
- Things from the application that might be discussed:
 - How the Federal grants are supporting the school/district school improvement plan
 - Professional development
 - If identified for Needs Improvement (Titles I, II-A, III), what strategies are being implemented
 - Staff being paid with federal funds



What is a Time and Effort Log?

- An **after-the-fact** report of the actual activity of an employee if all or part of his/her salary is paid with Federal funds.
- Sometimes called Semiannual Certification, Monthly Certification, or Personnel Activity Reports (PAR)
- Time-and-Effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.



What is a Single Cost Objective?

- A single function
- A single grant
- A single activity



How Do I Know if I'm Working on a Single Cost Objective?

- The key to determining whether an employee is working on a single cost objective is whether the employee's salary and wages can be supported *in full* from each of the Federal awards on which the employee is working, or from the Federal award alone if the employee's salary is also paid with non-Federal funds.



Who Should Complete a Semiannual Certification?

- An employee whose salary is supported by
 - Only one Federal program
 - Only one cost objective
 - Nebraska's Substitute Reporting System allows for employees having set schedules, meaning they carry out the same duties for the same amount of time each pay period and thus submit the same documentation every month, to submit semiannual certifications



What Does Semiannual Certification Look Like?

- Prepared at least semiannually; can be done more often (**i.e. monthly or by semester**).
 - 12-month contracts need to account for summer
- To be signed by the employee **AND** supervisory official having firsthand knowledge of the work performed by the employee.



Sample Semiannual Certification

**Must be signed by
the employee AND
supervisory official
having firsthand
knowledge of the
work performed by
the employee.**

Semi-Annual Certification Activity Report for Employees Coded to a Federal Grant School Year 20__ - __

_____ Public Schools

_____ Funding (____ %) and _____ Funding (____ %)
(Federal Program salary paid from) (Other source of funding, ie District)

For the 1st Semester 20__ - __ School Year

I certify that the employee listed below worked 100% of their time on a single federal award or cost objective.

Employee Name	Employee Title

Employee Signature

Date

Supervisory Signature

Date



Who Should Complete Monthly Certifications or Personnel Activity Reports?

- Employees supported by multiple cost objectives
- Nebraska's Substitute Reporting System allows for employees having set schedules, meaning they carry out the same duties for the same amount of time each pay period and thus submit the same documentation every month, to submit semiannual certifications
 - In the absence of the substitute reporting system, a monthly PAR would be required



Sample Monthly Certification / Personnel Activity Report

**Must be signed by
the employee AND
supervisory official
having firsthand
knowledge of the
work performed by
the employee.**

Time and Effort Log Sample

List Specific Funding Sources Below

Staff Name:				
Month/Year:				
	Funding Source 1	Funding Source 2	Funding Source 3	Total Hours
Date				
1				0
2				0
3				0
4				0
5				0
6				0
7				0
8				0
9				0
10				0
11				0
12				0
13				0
14				0
15				0
16				0
17				0
18				0
19				0
20				0
21				0
22				0
23				0
24				0
25				0
26				0
27				0
28				0
29				0
30				0
31				0
Monthly Totals	0	0	0	0

SAMPLE



NEBRASKA'S SUBSTITUTE REPORTING SYSTEM



- Beginning in 2013-14 school year, Nebraska implemented a Substitute Reporting System
- **NEW** for 2014-15
 - One time certification from LEAs indicating that only eligible employees will participate in the substitute system and that the LEA has in place sufficient controls to ensure that the schedules are accurate
 - Will be in CDC



To be Eligible to Document Time and Effort Under the Substitute System, Employees Must:

- Currently work on a schedule that includes multiple activities or cost objectives that typically must be supported by monthly personnel activity reports;
- Work on specific activities or cost objectives based on a predetermined schedule; **and**
- Not work on multiple activities or cost objectives at the exact same time on their schedule.



Under the Substitute System

- In lieu of PARs, eligible employees may support a distribution of their salaries and wages through documentation of an established work schedule.
- An acceptable work schedule may be in a style and format already used by the District.



Employee Schedules Must:

- Indicate the specific activity or cost objective that the employee worked on for each segment of the employee's schedule;
- Account for the total hours for which each employee is compensated during the period reflected on the employees schedule; and
- **Be certified at least semiannually and signed by the employee AND supervisory official having firsthand knowledge of the work performed by the employee.**



Substitute Reporting System Allows Semiannual Reporting for a Fixed Schedule

Sample Certification for Fixed Schedule

Sample Employee Certification and Schedule

Example Substitute System Time-and-Effort Certification – Employee with Fixed Schedule

Employee: Jane Doe
Position: Instructional Assistant
School: Lincoln Elementary

Certification Period:

8/15/2012 to 2/15/2013

Type of Schedule:

☐ Daily
☒ Weekly
☐ Biweekly
☐ Other: _____



Program or Cost Objective	Distribution of Time
Title I, Part A – Improving the Academic Achievement of the Disadvantaged	42%
IDEA, Part B – Federal Special Education	13%
State or Local	45%
TOTAL	100%

I certify that I performed work consistent with the attached schedule and as distributed in the above percentages during the Certification Period.

Jane Doe 2/20/2013
Employee Signature Date

I certify that I have firsthand knowledge that the above employee performed work consistent with the attached schedule and as distributed in the above percentages during the Certification Period.

Mary Smith 2/21/2013
Supervisor Signature Date

Sample Schedule for Fixed Schedule

Sample Employee Certification and Schedule

2012–2013 SCHOOL YEAR SCHEDULE

Employee: Jane Doe
Position: Instructional Assistant
School: Lincoln Elementary

Monday	Tuesday	Wednesday	Thursday	Friday
8:00-8:30 Consult with staff regarding Title I students/curriculum	8:00-8:30 Consult with staff regarding Title I students/curriculum	8:00-8:30 Consult with staff regarding Title I students/curriculum	8:00-8:30 Consult with staff regarding Title I students/curriculum	8:00-8:30 Consult with staff regarding Title I students/curriculum
8:30-8:45 Break	8:30-8:45 Break	8:30-8:45 Break	8:30-8:45 Break	8:30-8:45 Break
8:45-9:15 Special ed. support	8:45-9:15 Special ed. support	8:45-9:15 Special ed. support	8:45-9:15 Special ed. support	8:45-9:15 Special ed. support
9:15-10:00 Small group reading	9:15-10:00 Small group reading	9:15-10:00 Small group reading	9:15-10:00 Small group reading	9:15-10:00 Small group reading
10:00-10:30 Small group math	10:00-11:00 2 nd grade Title I reading/math	10:00-10:30 Small group math	10:00-11:00 2 nd grade Title I reading/math	10:00-10:30 Small group math
10:30-11:00 2 nd grade Title I reading/math		10:30-11:00 2 nd grade Title I reading/math		10:30-11:00 2 nd grade Title I reading/math
11:00-11:30 Lunch Break	11:00-11:30 Lunch Break	11:00-11:30 Lunch Break	11:00-11:30 Lunch Break	11:00-11:30 Lunch Break
11:30-11:45 Individual special ed. student catch-up	11:30-11:45 Individual special ed. student catch-up	11:30-11:45 Individual special ed. student catch-up	11:30-11:45 Individual special ed. student catch-up	11:30-11:45 Individual special ed. student catch-up
11:45-12:35 Small group math	11:45-12:35 Small group math	11:45-12:35 Small group math	11:45-12:35 Small group math	11:45-12:35 Small group math
12:35-1:05 Small group writing	12:35-1:05 Small group writing	12:35-1:05 Small group writing	12:35-1:05 Small group writing	12:35-1:05 Small group writing
1:05-1:20 Break	1:05-1:20 Break	1:05-1:20 Break	1:05-1:20 Break	1:05-1:20 Break
1:20-1:40 Title I prep	1:20-1:40 Title I prep	1:20-1:40 Title I prep	1:20-1:40 Title I prep	1:20-1:40 Title I prep
1:40-2:30 First grade Title I reading/math	1:40-2:30 First grade Title I reading/math	1:40-2:30 First grade Title I reading/math	1:40-2:30 First grade Title I reading/math	1:40-2:30 First grade Title I reading/math
2:30-3:30 Title I lesson planning and student learning plan follow-up	2:30-3:00 Title I lesson planning 3:00-3:30 Bus duty	2:30-3:30 Title I lesson planning and student learning plan follow-up	2:30-3:00 Title I lesson planning 3:00-3:30 Bus duty	2:30-3:30 Title I lesson planning and student learning plan follow-up



If a Set Schedule Changes

- Any revisions to an employee's established schedule that continue for **2 weeks or more** must be documented and certified in accordance with the requirements.
- Any significant deviations from an employee's established schedule, that require the employee to work on multiple activities or cost objectives at the exact same time, including, but not limited to lengthy, unanticipated schedule changes, must be documented by the employee using a Personnel Activity Report (PAR) that covers the period during which the deviation occurred.



Monthly or Semiannual Certification Required?



(1) Title I-A Funds and State Compensatory Education Funds

- A District supports a supplemental math teacher to serve low-achieving students with 50% Title I-A funds and 50% State compensatory education funds.
- Teaching math to low-achieving students is a single cost objective because it can be fully supported under Title I, Part A. Only semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.



(2) Title I-A Funds and Local Funds

- A teacher in a Title I Schoolwide school is paid with local funds to teach first grade in the morning to decrease class size for reading and is paid with Title I-A funds to teach a supplemental reading class in the afternoon. The school has a sufficient number of first-grade teachers to meet the requirements of ESEA §1114(a)(2)(B).
- Because the part-time first-grade teacher is not needed in order to provide the basic education program in the Schoolwide program school, her salary could be supported with Title I-A funds, even though it is not. Similarly, her salary for providing supplemental reading could be supported with Title I-A funds. Both of her functions, therefore, are fully supportable with Title I-A funds, and the Schoolwide program constitutes a single cost objective. Only a **semiannual certification** is required, even though the teacher's salary is supported by a Federal award and local funds and she conducts two different activities.



(5) Title I-A Funds and Local Funds

- A district supports an elementary school teacher with local funds in a Targeted Assistance School, but she is paid with Title I-A funds to provide after school tutoring for low-achieving students.
- Although the teacher could not be paid with Title I-A funds to provide elementary education, the portion of her time spent on after-school tutoring is easily separated from her teaching position by her schedule. Accordingly, the teacher's after school tutoring is a single cost objective and she need only file the semiannual certification for the time she works in the after school program supported by Title I-A funds.



(3) Funds under Sections 611 and 619 of the Individuals with Disabilities Education Act (IDEA)

- A preschool special education teacher is funded with 50% IDEA § 611 funds and 50% with IDEA §619 funds.
- Teaching preschool special education is an allowable activity under both IDEA § 611 and § 619. Accordingly, the teacher is performing a single cost objective even though she is supported with funds from two separate Federal awards; therefore she need only file a semiannual certification.



(6) Funds Under Sections 611 of IDEA and State Reimbursable Local Education Funds

- a. An LEA supports a special education teacher serving school age children with disabilities with 50% § 611 IDEA funds and 50% State reimbursable local education funds.
 - Special Education services provided to school age students is a single cost objective because it can be fully supported under § 611 IDEA (ages 0-21). Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.



(6) Funds Under Sections 611 of IDEA and State Reimbursable Local Education Funds

- b. An LEA supports a special education teacher serving school age and birth to age five children with disabilities with § 611 IDEA funds and State reimbursable local education funds.
 - Special Education services provided to school age and birth to age five students in this case is ***not*** a single cost objective. The objectives can be fully supported under § 611 of IDEA (ages 0-21), however; State reimbursable local funds ***cannot*** support the birth to age five objective. A Personnel Activity Report (PAR) is required.



(7) Funds Under Sections 611 of IDEA and Non-reimbursable Local Education Funds

- An LEA supports a special education teacher serving birth to age five children with disabilities with § 611 IDEA funds and non-reimbursable local education funds.
- Special Education services provided to birth to age five students is a single cost objective because it can be fully supported under § 611 of IDEA (ages 0-21). Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.



(8) Funds Under Sections 611 and 619 of IDEA

- An LEA supports a special education teacher serving birth to age five children with disabilities with § 611 and § 619 IDEA funds.
- Special Education services provided to birth to age five students in this case is **NOT** a single cost objective. The objectives can be fully supported under § 611 IDEA (ages 0-21), however, § 619 IDEA funds can **ONLY** support age three and four year old services objective. A monthly Personnel Activity Report (PAR) is required.



(13) ESEA Title VII, Part A Formula Grant Funds and State/Local Funds

- A high school math teacher's regular salary is paid with State and local funds. The teacher conducts an after-school support program for Native American students in the school and also teaches at a summer academic camp for Native American students in the school district. For both of these activities, the instructor is paid from Title VII-A funds.
- Although the teacher could not be paid with Title VII-A funds to teach high school math, the portion that the teacher is paid with Title VII-A funds is easily segregated from his daily teaching schedule. Accordingly, the teacher's after-school and summer activities are each a single cost objective and the teacher need only file a semiannual certification for the time he is paid with Title VII-A funds.



More Examples...

Included in the NDE “State and Federal Grant Management Requirements and Guidance.”

[http://www.education.ne.gov/federalprograms/ESEA NCLB Programs.html](http://www.education.ne.gov/federalprograms/ESEA_NCLB_Programs.html) beneath the header “Grants Management (GMS) and Finance”



Questions?

